

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA GIUFFRE,  
  
Plaintiff,

v.

ALAN DERSHOWITZ,  
  
Defendant.

Civil Action No. 1:19-cv-3377 (LAP)

**ADDENDUM TO  
AGREED PROTECTIVE ORDER**

ALAN DERSHOWITZ,  
  
Counterclaim Plaintiff,  
  
v.  
  
VIRGINIA L. GIUFFRE,  
  
Counterclaim Defendant.

THIS MATTER comes before the Court pursuant to a joint motion by Defendant Alan Dershowitz and Plaintiff Virginia Giuffre for an Addendum to the Protective Order in order to designate as “Confidential” the settlement agreement from *Dershowitz v. Netflix, Inc., et al.*, Civil Action No. 21-21961 (Southern District of Florida) (the “*Netflix* Settlement Agreement”). The Court having considered the motion and other matters of record herein, and it appearing to the Court and the Court finding that given that the *Netflix* Settlement Agreement is by its terms required to be kept confidential; it further appearing to the Court that the interests of justice require the confidentiality of the *Netflix* Settlement Agreement be maintained; and it further appearing to the Court and the Court finding that it is in the public interest to allow the production of the *Netflix* Settlement Agreement in this litigation, that the need for disclosure outweighs any individual’s

privacy rights, and that the protections afforded under the Protective Order and this Addendum are adequate to guard the confidentiality of this information.

IT IS, THEREFORE, ORDERED with the consent of the parties that an Addendum to the Protective Order be entered for the purposes of assuring the confidentiality of the *Netflix* Settlement Agreement, as follows:

1. The Protective Order in this action as entered on December 21, 2020<sup>1</sup> will govern the production of the *Netflix* Settlement Agreement.
2. The *Netflix* Settlement Agreement may be designated “confidential” pursuant to the Protective Order.
3. Pursuant to paragraph 15 of the Protective Order in this action, the signatories to the *Netflix* Settlement Agreement may petition the Court to restrict the use at trial of the *Netflix* Settlement Agreement.

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<sup>1</sup> This Addendum incorporates any subsequent modifications to this Protective Order agreed to by the parties or entered by the Court.

For Plaintiff:

/s/ Nicole J. Moss

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*Attorneys for Defendant Alan Dershowitz*

SO ORDERED AND SIGNED this \_\_\_\_ day of \_\_\_\_\_, 2022.

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Hon. Loretta A. Preska

Senior United States District Judge